

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Global Brokerage, Inc. f/k/a FXCM Inc.
Securities Litigation

Master File No. 1:17-cv-00916-RA-BCM

CLASS ACTION

This Document Relates To: All Actions

**SUPPLEMENTAL DECLARATION OF MARGERY CRAIG CONCERNING:
(A) MAILING OF THE POSTCARD NOTICE; AND (B) REPORT ON
REQUESTS FOR EXCLUSION AND OBJECTIONS**

I, Margery Craig, declare as follows:

1. I am a Project Manager of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over fifteen years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five hundred twenty-five (525) class action cases since its inception. I have personal knowledge of the facts set forth herein, and if called on to do so, I could and would testify competently thereto.

UPDATE ON MAILING OF THE POSTCARD NOTICE

2. Pursuant to the Court’s Order Granting Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, dated February 21, 2023, (Dkt. No. 357, the “Preliminary Approval Order”), SCS was appointed and approved as the Claims Administrator to supervise and administer the notice procedure as well as the processing of claims in connection with the Settlement of the above-captioned action.¹ I submit this declaration as a supplement to my previously filed Declaration of Margery Craig Concerning: (A) Mailing of the Postcard Notice;

¹ All capitalized terms used herein that are not otherwise defined have the meanings ascribed to them in the Stipulation of Settlement, dated February 1, 2023 (Dkt. No. 352, the “Stipulation”).

(B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections, dated June 9, 2023 (Dkt. No. 365, the “Craig Declaration”) in order to provide the Court and the Parties with updated information regarding the notifications to potential Class Members, as well as updates concerning other aspects of the Settlement administration process.

3. As reported in the Craig Declaration, SCS mailed or emailed 1,785 letters to the Nominee Account Holders and Institutional Groups contained on SCS’s master mailing list. As noted in the Craig Declaration, 41,589 Postcard Notices have been mailed to potential Class Members and nominees. Additionally, SCS was notified by a nominee that they emailed 19,717 of their clients to notify them of this settlement and provide the link to the location of the Long Notice and Proof of Claim on the settlement webpage. Since the Craig Declaration, no additional Postcard Notices have been mailed and no additional emails with a link to the location of the Long Notice and Proof of Claim were sent. In total, as of the date of this Declaration, 61,306² potential Class Members were either mailed a Postcard Notice or emailed the link to the location of the Long Notice and Proof of Claim on the settlement webpage.

UPDATE ON TOLL-FREE TELEPHONE LINE

4. The Craig Declaration noted that SCS maintains a toll-free telephone number (1-866-274-4004) for Class Members to call and obtain information about the Settlement as well as request the Long Notice and Proof of Claim to be mailed to them. SCS continues to respond promptly to each telephone inquiry and will continue to respond to Class Member inquiries via the toll-free telephone number.

² As reported in the Craig Declaration, SCS received 33 requests from potential Class Members for the Long Notice and Proof of Claim to be mail to them. Since the Craig Declaration no additional Long Notice and Proof of Claim were requested.

UPDATE ON SETTLEMENT WEBPAGE

5. As noted in the Craig Declaration, on March 2, 2023, SCS established a webpage on its website at www.strategicclaims.net/FXCM. The webpage is accessible 24 hours a day, 7 days a week. The webpage contains a current status, the case deadlines, the online claim filing link, and important case documents. SCS continues to maintain the webpage.

UPDATE ON REPORT ON EXCLUSIONS AND OBJECTIONS

6. The Postcard Notice, Long Notice, Summary Notice, and the settlement webpage informed potential Class Members that written requests for exclusion were to be mailed or delivered to SCS such that they were received no later than June 16, 2023. SCS has been monitoring all mail delivered for this case. The Craig Declaration stated that SCS received one invalid exclusion request. Exhibit E to the Craig Declaration contained a copy of the invalid request and the email notice to the potential Class Member explaining what information and documentation was required and provided an opportunity to cure the deficient request. To date, SCS has not received any response to this notice, and SCS has not received any further requests for exclusion.

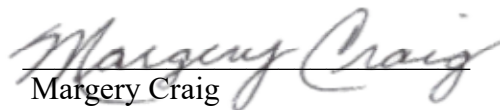
7. According to the Long Notice and Summary Notice, Class Members seeking to object to the Settlement, any part of the Settlement, the Plan of Allocation, Class Counsel's motion for attorney's fees and expenses, or application for an Award to Plaintiffs must be submitted to Class Counsel and Counsel for Individual Defendants, as well as filed with the Clerk of the Court, no later than June 16, 2023. As of the date of this declaration, SCS has not received any objections, and SCS has not been notified that any objections were submitted.

CLAIMS RECEIVED TO DATE

8. As of the date of this declaration, SCS has received 5,947 claims. These claims were submitted by or on behalf of individuals or entities either by mail or online. The claims filing deadline required all claims to be postmarked or received by June 6, 2023. SCS is currently conducting quality assurance reviews of the submitted claims, such as verifying that the claim included the required supporting documentation and detecting duplicative claims. Once this audit is complete, claimants with incomplete or invalid claims will be given an opportunity to supplement or complete their claims. With these steps outstanding, the number of claims considered valid has not yet been determined.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21st day of June 2023, in Media, Pennsylvania.


Margery Craig